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July 17, 2000

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JUL 17 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Dear Ms. Salas:

**RE: Numbering Resource Optimization-CC Docket No. 99-200**

Enclosed please find an original and eleven (11) copies of the above-referenced Petition for Reconsideration and Clarification to be filed with the Secretary of the Commission on Monday, July 17, 2000. Additional copies of the pleadings are attached to be used as the courtesy copies and one copy included for your files.

Thank you for your assistance.

Very truly yours,

A handwritten signature in cursive script that reads "Hope Thurrott". The signature is written in dark ink and is positioned below the typed name.

Enclosures

No. of Copies rec'd 019  
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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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In the Matter of )

JUL 17 2000

Number Resource Optimization )

CC Docket No. 99-200  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**PETITION FOR RECONSIDERATION AND CLARIFICATION**

SBC Communications Inc., on behalf of its subsidiaries and itself, (collectively referred to as "SBC") requests the Commission reconsider certain matters relating to its Report and Order<sup>1</sup> in this proceeding which, if allowed to remain unmodified, will have a significant adverse impact not only on carriers, but the customers they serve. Specifically, the limitation of 45 days on reserve numbers fails to reflect the needs of customers and is unsupported by the existing record as a whole. Moreover, the Commission's requirement which prohibits carriers from assigning numbers from unopened blocks until "all available" numbers are used further hinders the ability of carriers to meet customer needs. Compounding the dilemma faced by carriers and customers is the utilization calculation adopted by the Commission; this calculation should properly reflect those resources unavailable for assignment by the carrier, including official and intermediate numbers, by including such numbers in both the numerator and the denominator.

SBC also seeks further clarification as to the three-prong test to be met by state authorities in order to receive authorization for number pooling. In meeting the second prong of this standard, the Commission should clarify that, in proving that an NPA has a life span of at

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<sup>1</sup> Report and Order and Further Notice of Proposed Rulemaking, *In the Matter of Numbering Resource Optimization*, CC Docket No. 99-200, released March 31, 2000 (Report and Order).

least one year, the state authority must rely on actual demand. Furthermore, the Commission should clarify the relationship between federal and state cost recovery in relation to costs incurred for number pooling. The resolution of these matters will further the Commission's goal of conserving the limited resource of available numbers while minimizing the deleterious impact on carriers and their customers.

**I. The Commission's adoption of a 45-day limitation for reserve numbers is unsupported by the record**

The Commission has adopted a 45-day reservation period, stating that this limitation "reasonably balances the needs of carriers to earmark and set aside a number or groups of numbers for a particular customer against the objective of improving the efficiency of numbering resource use."<sup>2</sup> This action was taken by the Commission with recognition of the North American Numbering Council (NANC) recommendation, which was based on a comprehensive review, that carriers be permitted to reserve numbers for twelve months with an additional six months of possible extensions. The support on the record for the Commission's adoption of the 45-day period is minimal.

Indeed, the record as a whole supports the rejection of this period, not its endorsement. Numerous parties agreed with the time frame recommended by NANC.<sup>3</sup> Moreover, several commenting parties suggested a lengthier period to be appropriate.<sup>4</sup>

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<sup>2</sup> Report and Order, ¶ 23.

<sup>3</sup> See, e.g., Comments of MCI World Com, pp. 36-37; Bell Atlantic Comments, p. 6; Ameritech Reply Comments, p. 10 and USTA Reply Comments, p. 20.

<sup>4</sup> See, Comments of Winstar at page 53 which suggests a two-year reserve period with a one-year extension and the Comments of GTE at page 15 which suggests an 18 to 24 month period is required in certain competitive bid situations.

In addition, many commenting parties argued against the Commission setting any time limitation for reserve numbers. These parties contended that the determination of an appropriate time period for reserve numbers should be best left to NANC.<sup>5</sup>

Those only parties who produced evidence of the customer impact of the Commission's 45-day restriction were carriers who strongly opposed this limitation. Since it is these entities who deal on a daily basis with customers requiring numbering resources, this data should have been given significant weight in assessing the appropriate action to be taken by the Commission. Customers must reserve numbers to avoid disruption to operations and to meet growth plans. The impact of the 45-day limitation is to require a customer who has reserved numbers to either activate these numbers in advance of its projected need or risk losing these numbers to other customers. In either case, the customer is harmed as a result of the Commission's dictates. These concerns must not be summarily dismissed. The few commenting parties who endorsed the Commission's proposed 45-day limitation did not supply any evidence in support of the appropriateness of the 45-day time period.<sup>6</sup> In fact, none of these commenting parties addressed the impact of such a restriction on customers holding or requiring reserve numbers. Because of the significant adverse effect this rule will have on these customers, a time restriction pulled virtually "out-of-the-air" cannot be deemed a "reasonable balance" without the support of the record as a whole.

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<sup>5</sup> See, e.g., ALTS Comments, pp. 5-6; SBC Communications Inc Reply Comments, p. 4; USTA Reply Comments, p. 20.

<sup>6</sup> See, e.g., Comments of New York Department of Public Service, p. 6 footnote 1; Comments of North Carolina Utilities Commission, p. 4.

Under these circumstances, the Commission should either adopt the NANC recommendation, recognizing the comprehensive analysis on which it is based, or reopen the record to solicit evidence as to a supportable time restriction.<sup>7</sup>

**II. The Commission should permit carriers the flexibility of opening a new number block prior to the assignment of all available numbers from the preceding block.**

The Commission has adopted what it terms as a “flexible” requirement which mandates that carriers first assign “all available” telephone numbers within an open thousands-block before opening a new block, unless the available numbers are not sufficient to meet a customer request.<sup>8</sup> This requirement pertains to existing thousands-blocks as well as those opened in the future. A carrier that opens a clean block must be able to demonstrate to a state commission that it has a genuine customer request for telephone numbers which it is unable to fill from the “surplus of numbers” within the carrier’s activated thousands-block.<sup>9</sup> Yet, there is difficulty in reconciling this requirement with the Commission's definition of “assigned” numbers and the treatment of pending orders.

Currently, pending numbers are permitted to be identified as assigned for only five days;<sup>10</sup> after this period, it appears these same numbers may be reserved for a maximum of 45

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<sup>7</sup> In this context, the Commission should take note of the Joint Reply Comments of the Texas Office of Public Counsel and the National Association of State Utility Consumer Advocates (NASUCA) that the relationship between reserve numbers and numbering exhaust requires further study and that the record fails to establish that number reservations accelerate area code exhaust. *See*, Joint Reply Comments at page 10.

<sup>8</sup> Report and Order, ¶ 244

<sup>9</sup> Report and Order, ¶ 245.

<sup>10</sup> Report and Order, ¶ 19.

additional days.<sup>11</sup> During this 50-day period,<sup>12</sup> telephone numbers related to pending service order requests are unavailable for assignment. After this period, the numbers are to be categorized as “available,” even though service orders relating to these numbers are still pending. While within our Ameritech wireline company more than 85% of the service orders are completed within this 50-day period, the remaining orders are not completed within the time period for various customer and carrier reasons. These service order numbers cannot be assigned to new customers while the service order is pending.<sup>13</sup> The result is that since numbers for pending service orders are deemed to be “available,” a carrier may never meet the threshold required to open a new thousands-block; at any point in time a carrier may have as many as 10% of the numbers in a thousands-block designated to fulfill pending service orders.<sup>14</sup>

The Commission should recognize the realities of the marketplace and deem numbers being assigned pursuant to pending service orders as not available for purposes of this calculation. In other words, either the Commission should redefine numbers being held pending

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<sup>11</sup> Report and Order, ¶ 23.

<sup>12</sup> SBC recognizes that the Report and Order’s current differentiation between numbers held in pending status and reserve numbers necessitate that numbers held for pending service order completion must be reclassified as reserve numbers following the five-day limitation. For the reasons stated therein, SBC supports the position being taken by the United States Telephone Association in its Petition for Reconsideration and/or Clarification as to the modification of the definition of “pending numbers.”

<sup>13</sup> A subscriber must retain these numbers pending service order completion in order to arrange for the installation of telephone number-related equipment, the printing of business cards and stationary, the notification of supplies and customers, and other advance activities dependent upon the subscriber having numbers reserved for its use.

<sup>14</sup> Moreover, there is no practical method for a carrier to track numbers in order to satisfy the Commission’s “all or nothing” mandate. It is simply not possible for a large carrier to daily review the hundreds of thousands of orders pending and their current status to determine if all “available” numbers have been assigned within a given thousands-block.

service orders completion as falling within the “assigned” category until the order completes or the Commission should extend the reserve number definition as recommended by NANC.

**III. The Commission must clarify that costs related to number pooling are includable under federal cost recovery.**

In the Report and Order, the Commission concluded that thousands-block pooling is a numbering administrative function and the costs of such pooling are to be recovered through an exclusively federal recovery mechanism.<sup>15</sup> Yet, the Commission has granted, and in the future will grant, numerous state commission the authority to conduct number pooling trials. In this context, individual state cost recovery schemes are to be transitioned to a federal cost recovery plan when it becomes effective.<sup>16</sup>

As discussed during SBC’s *ex parte* meeting of May 31, 2000,<sup>17</sup> there remain several open issues as to which costs are to be recovered under the federal cost recovery mechanism, rather than through the vehicle of state cost recovery. Given the possible discrepancy of the views of the states as to what costs might be considered recoverable as attributable to state pooling trials, SBC requests the Commission clarify that any unrecovered costs incurred as a result of state pooling trials are includable under the federal cost recovery mechanism.

In addition, the Commission should clarify that costs directly related to the implementation of NPAC 3.0 and Efficient Data Representation (EDR) are recoverable under federal cost recovery as costs directly attributable to national number pooling. As the

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<sup>15</sup> Report and Order, ¶¶ 195, 196.

<sup>16</sup> Report and Order, ¶171.

<sup>17</sup> See, letter to Ms. Magalie Roman Salas, Secretary of the Federal Communications Commission, from Fred Goodwin, Executive Director/Federal Regulatory of SBC, dated June 1,

Commission is aware, EDR gives carriers the capability to store one record to represent 1000 consecutive numbers. NPAC 3.0 is software specifically designed to be EDR-capable in order to store information in an EDR or non-EDR format. By early 2001, all of the NPAC regions will be using the NPAC 3.0 release. EDR is to be deployed to support the national roll out of number pooling in 2001. Neither of these two innovations would have been developed and implemented but for national number pooling. Even though these deployments will support state trials in the future, the reason for this development and implementation is the national pooling effort. Therefore, the costs directly attributable to these modifications should be properly recoverable under the federal cost recovery mechanism.

**IV. Intermediate numbers should be included in the numerator and denominator in the calculation of utilization.**

The Commission has determined that the utilization level in a specific geographic area is to be calculated by dividing all assigned numbers (numerator) by the total numbering resources assigned to the carrier in the appropriate geographic region (denominator) and multiplying the result by 100.<sup>18</sup> The Commission stated that intermediate numbers should not be counted in the code or block holder's inventory because the code or block holder does not control the provisioning of these numbers to end users.<sup>19</sup> Thus, it appears that intermediate numbers are excluded from the calculation of utilization.

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2000 attaching a letter sent by Mr. Goodwin on that same date to L. Charles Keller, Chief of the Network Division of the Common Carrier Bureau.

<sup>18</sup> Report and Order, ¶109.

<sup>19</sup> Report and Order, ¶21.



It still remains unclear why these numbers should be designated under a separate category, rather than simply shown as “assigned numbers” since the underlying carrier has no ability to reclaim these numbers from another carrier or outside entity for its own use. Regardless, these numbers should appropriately be included as part of the numbering resources of the underlying carrier. These numbers are “assigned” for all practical purposes since, as recognized by the Commission, they are not within the carrier’s control. Therefore, these numbers should be appropriately reflected in both the numerator and denominator of the utilization calculation. To exclude these numbers distorts the carrier’s utilization by indicating a lower percentage than that which would result from the proper inclusion of these numbers in the calculation.

**V. Official numbers should be appropriately categorized as assigned numbers.**

In the Report and Order, the Commission expanded the definition of administrative numbers to include all numbers “used by carriers to perform internal administrative or operational functions necessary to maintain reasonable quality of service standards.”<sup>20</sup> This extremely broad definition fails to take into consideration the fact that the carrier does not have the discretion to assign these numbers to customers to address a numbering shortfall. Rather these numbers should be more appropriately categorized as assigned numbers. Although the percentage of official numbers is minimal in comparison with the carrier’s total numbering resources, in certain select geographic areas these numbers comprise a significant percentage for purposes of utilization calculations. The carrier should not reasonably be expected to somehow divest itself of numbers assigned to its employees and necessary to its own operation, in order to

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<sup>20</sup> Report and Order, ¶32.

obtain needed numbers for assignment to customers. Such an approach not only hinders a carrier's ability to operate efficiently, it acts to the detriment of customers. In addition to calling party confusion, there is also the question of aging. Moreover, the record fails to support the conclusion that these numbers are being misused by carriers to hoard numbers needed by the public.

**VI. Additional clarification is required as to the Commission's three-prong test for state authorities to conduct number pooling trials.**

SBC further asks the Commission eliminate any potential confusion with regard to the three-prong test adopted by the Commission in relation to the delegation of authority to the states to conduct number pooling trials. The Commission requires that a state petition demonstrate the following: (1) that an NPA in the state is in jeopardy; (2) that the NPA in question has a life span of at least one year and; (3) that the NPA is in one of the largest 100 MSAs or, alternatively, the majority of wireline carriers in the NPA are long term number portability (LNP) capable.<sup>21</sup> With regard to the second factor, SBC requests the Commission clarify that the one year life span must be demonstrated through the use of actual demand/forecast data, rather than allocation or lottery plan data. Although the Public Notice<sup>22</sup> specified that the NPA in question must have a remaining life span according to the most recent NANPA forecast, further clarification is still required. Unless the requirement for actual demand/forecast data is made clear, there is the potential that data produced could reflect means undertaken by the states or other parties to artificially extend the life of the NPA.

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<sup>21</sup> Report and Order, ¶170.

<sup>22</sup> Public Notice, *Common Carrier Bureau Responses to Questions in the Numbering Resource Optimization Proceeding*, CC Docket. No. 99-200, DA 00-1549, released July 11, 2000.

## **Conclusion**

The Commission is faced with a daunting task of establishing a national plan for the conservation of numbering resources. However, in adopting such a plan, it must also weigh the impact of these measures on customers. This impact is undeniably relevant in determining what is in the overall public interest and must be taken into consideration. The Commission's reconsideration and clarification of the issues specified above will strike a reasonable and warranted balance between customer needs and numbering resource optimization.

Respectfully Submitted,

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By 

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## **CERTIFICATE OF SERVICE**

I, Loretia Hill, do hereby certify that on this 17th day of July, 2000, a copy of the foregoing "Petition" was served by U.S. first class mail, postage paid, to the parties listed on the attached sheets.

A handwritten signature in cursive script, reading "Loretia Hill", written over a horizontal line.

Loretia Hill

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